

Exhibit N

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

DANIEL 'LA DEERING,

Plaintiff,

v.

LOCKHEED MARTIN CORPORATION,
et al.,

Defendants.

Case No.: 0:20-cv-01534-DSD-BRT

**PLAINTIFF'S SUPPLEMENTAL
RULE 26(a)(1) DISCLOSURES
(AMENDED IV)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff above-named offers the following Supplemental Disclosure regarding Plaintiff's mitigation earnings in 2019-2022. This corrects the calculations previously provided for prior mitigation of wages. Attached is a summary of past and future wage loss which considers discount rate, reasonable work life expectancy of age 67, analysis of the mitigation compensation components, and reduction to present value.

These disclosures are based on the information reasonably available to Plaintiff at this time and are made without waiving any objections. Plaintiff reserves the right to revise, correct, supplement or clarify the disclosures at any time, consistent with Rule 26(e) of the Federal Rules of Civil Procedure, as additional witnesses, documents and damages become known.

In 2019, Plaintiff earned \$43,535 (See DD640)

In 2020, Plaintiff earned \$234,690 (See DD1408)

In 2021, Plaintiff earned \$200,054 (See DD3565)

In 2022, Plaintiff earned \$453,261 (See DD3695) – Plaintiff’s 2022 compensation included her base salary, a bonus, and actualization of Restricted Stock Units because her employer – Anaplan – was bought. Plaintiff remains employed by Anaplan Inc.

Dated: June 11, 2023

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ATTORNEYS FOR PLAINTIFF

EXHIBIT 1
DANIELLA DEERING
SUMMARY OF LOST WAGES & BENEFITS

DRAFT VERSION - 6/9/2023

Date of Birth: 11/13/1964
Termination: 12/27/2018
Trial Date: 6/26/2023

Discount Rate: 4.2%

		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
					(C / 12 x A)	(D x .42)			(D x .04)	(D+E+F+G+H)	(Exh. 2)		(J - K)	
Year	Age	No. of Months	Salary Growth	LM Base Salary	Prorated Lost Base Salary	42% MICP Bonus	Vested RSU Awards	Vested Cash Incentive	4.0% Employer 401(k)	Expected Lockheed Martin	Less Mitigation Earnings	Annual Loss	Present Value	Cumulative Present Value
2018	54			263,900	-	110,838	-	-	-	110,838	-	110,838	110,838	\$ 110,838
2019	55	12	4.2%	274,984	274,984	115,493	103,345	74,000	10,999	578,821	43,535	535,286	535,286	\$ 646,124
2020	56	12	4.2%	286,533	286,533	120,344	136,238	80,000	11,461	634,576	234,690	399,886	399,886	\$ 1,046,010
2021	57	12	4.2%	298,567	298,567	125,398	27,420	25,000	11,943	488,328	200,054	288,274	288,274	\$ 1,334,284
2022	58	12	4.2%	311,107	311,107	130,665	75,830	64,750	12,444	594,796	463,661	131,135	131,135	\$ 1,465,419
2023	59	6	4.2%	324,173	162,087	68,077	37,915	32,375	6,483	306,937	238,045	68,892	68,892	\$ 1,534,311
Past Loss													\$ 1,534,311	
2023	59	6		324,173	162,087	68,077	37,915	32,375	6,483	306,937	238,045	68,892	67,490	\$ 1,601,801
2024	60	12	4.2%	337,788	337,788	141,871	75,830	64,750	13,512	633,751	489,901	143,850	135,241	\$ 1,737,042
2025	61	12	4.2%	351,975	351,975	147,830	75,830	64,750	14,079	654,464	504,292	150,172	135,494	\$ 1,872,536
2026	62	12	4.2%	366,758	366,758	154,038	75,830	64,750	14,670	676,046	372,048	303,998	263,229	\$ 2,135,765
2027	63	12	4.2%	382,162	382,162	160,508	75,830	64,750	15,286	698,536	387,674	310,862	258,323	\$ 2,394,088
2028	64	12	4.2%	398,213	398,213	167,249	75,830	64,750	15,929	721,971	403,956	318,015	253,615	\$ 2,647,703
2029	65	12	4.2%	414,938	414,938	174,274	75,830	64,750	16,598	746,390	420,922	325,468	249,097	\$ 2,896,800
2030	66	12	4.2%	432,365	432,365	181,593	75,830	64,750	17,295	771,833	438,600	333,233	244,760	\$ 3,141,560
2031	67	12	4.2%	450,524	450,524	189,220	75,830	64,750	18,021	798,345	457,022	341,323	240,597	\$ 3,382,157
Future Loss													\$ 1,847,846	
Total Loss		13.0	years		4,630,088	2,055,475	1,025,303	826,500	185,203	8,722,569	4,892,445	3,830,124	\$ 3,382,157	

EXHIBIT 2
DANIELLA DEERING
SUMMARY OF MITIGATION EARNINGS

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	
				(C / 12 x A)	(D x .2)		(D x .04)		(D+E+F+G+H)	
Year	Age	No. of Months	Salary Growth	Anaplan Base Salary	Prorated Base Salary	20% Incentive Bonus	Anaplan RSU Payments	4.0% Employer 401(k)	Tax Return Mitigation Wages	Total Mitigation Earnings
2019	55	12							43,535	43,535
2020	56	12							234,690	234,690
2021	57	12							200,054	200,054
2022	58	12		260,000				10,400	453,261	463,661
2023	59	6	2.0%	265,200	132,600	26,520	73,621	5,304		238,045
2023	59	6		265,200	132,600	26,520	73,621	5,304		238,045
2024	60	12	4.2%	276,338	276,338	55,268	147,241	11,054		489,901
2025	61	12	4.2%	287,944	287,944	57,589	147,241	11,518		504,292
2026	62	12	4.2%	300,038	300,038	60,008	-	12,002		372,048
2027	63	12	4.2%	312,640	312,640	62,528	-	12,506		387,674
2028	64	12	4.2%	325,771	325,771	65,154	-	13,031		403,956
2029	65	12	4.2%	339,453	339,453	67,891	-	13,578		420,922
2030	66	12	4.2%	353,710	353,710	70,742	-	14,148		438,600
2031	67	12	4.2%	368,566	368,566	73,713	-	14,743		457,022
		13.0	years	2,829,660		565,933	441,724	123,588	931,540	\$ 4,892,445